

November 22, 2019

VIA ECF

Honorable Lorna G. Schofield
 United States District Judge
 Thurgood Marshall U.S. Courthouse
 40 Foley Square
 New York, NY 10007

RE: *Contant, et al. v. Bank of America Corp., et al.*, No. 17-cv-3139

Dear Judge Schofield:

Pursuant to the Court's November 19, 2019, Order providing that Plaintiffs shall submit a proposed revised settlement schedule by November 22, 2019 (ECF No. 334), Plaintiffs respectfully propose the following settlement schedule, set forth herein and in the Proposed Order submitted with Plaintiffs' motion for preliminary approval of the Standard Chartered Bank ("SC") and Société Générale ("SG") settlements, submitted earlier today (ECF No. 337-1):

Event	Timeline
Plaintiffs' Motion for Approval of Notice and Plan of Allocation	Not later than 150 days after entry of the Court's Order granting Preliminary Approval of the SC and SG Settlements
Completion of Direct Notice to the Class ("Direct Notice Date")	Within 60 days from the entry of the Court's Order directing Direct Notice and approving Plaintiffs' Plan of Allocation
Completion of Publication Notice to the Class ("Publication Notice Date") ¹	Within 60 days from the entry of the Court's Order directing Publication Notice and approving Plaintiffs' Plan of Allocation
Submission of motion for attorneys' fees, expenses, and service awards for the class representatives.	30 days after the Notice Date
Deadline for Class Members to Opt Out of the Class or Object to the Settlements	60 days after the Notice Date
Plaintiffs' Notice to Court Identifying Persons or Entities Requesting Exclusion from the Class and Completion of the Notice Program	Within 15 days after the deadline to opt-out of the Settlements
Submission of motion and memorandum in support of final approval of the Settlements and any responses by the parties to any objections filed by and Class Members.	90 days after the Notice Date
Fairness Hearing	On a date to be determined by the Court
Claims Deadline	Within 120 days of the Fairness Hearing

¹ Collectively, the Direct Notice Date and Publication Notice Date are referred to herein as the Notice Date.

As set forth in the Memorandum in Support of Plaintiffs' Motion for Preliminary Approval of Settlements, Plaintiffs anticipate that this proposed schedule will provide sufficient time to ensure that consolidated classwide notice, claims administration, and distribution of claimant awards for the Citigroup, MUFG Bank, SC, and SG settlements are carried out efficiently and in a manner that is not unduly duplicative or costly at the expense of the Settlement Class members. ECF No. 338, at § VI.F.

Respectfully submitted,

/s/ Michael Dell'Angelo
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